

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

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ESTER LELCHOOK, *et al.*,

Plaintiff,

-against-

THE ISLAMIC REPUBLIC OF IRAN, *et al.*,

Defendants.

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Docket No.

16-cv-7078 (ILG) (rlm)

**NOTICE OF MOTION**

C O U N S E L :

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law, dated July 28, 2017; the exhibits annexed thereto; and upon the pleadings and proceedings heretofore had herein, the plaintiffs will move this Court, at the Courthouse located at 225 Cadman Plaza, Brooklyn, New York, at a date and time to be determined by the Court, or as soon thereafter as counsel can be heard, for an order:

a) PERMITTING limited discovery regarding facts relevant to the Court's personal jurisdiction over defendant Bank Saderat PLC ("BSPLC"), and DIRECTING the defendant BSPLC to answer the discovery demands served by the plaintiffs herein; and

b) GRANTING such other and further relief as is just and proper under the circumstances.

Dated: Brooklyn, New York  
July 28, 2017

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC  
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